

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NEWLEAD HOLDINGS LTD., :
Petitioner, : 14-CV-03945 (WHP)
vs. :
ECF Case
IRONRIDGE GLOBAL IV LIMITED, :
Respondent, : **Electronically Filed**
and : **Notice of Motion to Dismiss**
VSTOCK TRANSFER, LLC, as transfer agent, :
Notice Party. :
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PLEASE TAKE NOTICE that Respondent Ironridge Global IV Limited will move this Court, before the Honorable William H. Pauley III, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, at a date and time decided by the Court, to enter an order (1) dismissing the Petition in its entirety; or in the alternative, (2) denying Petitioner NewLead's Motion for Temporary Restraining Order and Injunction In Aid of International Arbitration Proceeding in its entirety; or, if a preliminary injunction is entered; (3) directing NewLead to post a bond in the amount of \$50 million and (4) granting such other and further relief as it may deem just and proper.

Dated: New York, New York
June 6, 2014

By: /s/ Robert A. Fumerton
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